



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 22 2008

REPLY TO THE ATTENTION OF:

AE-17J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Lee Nadler
President
Lakeside Lithography, LLC
1600 South Laflin Street
Chicago, Illinois 60608

RE: Notice of Violation
Lakeside Lithography, LLC

Dear Mr. Nadler:


This is to advise you that the U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to Lakeside Lithography, LLC. We find that you are violating Illinois construction permit 98080080.

We have several enforcement options under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you the opportunity to present information on the specific findings of violation, the efforts you have taken to comply, and the steps you will take to prevent future violations.

The EPA contact in this matter is Kushal Som, at (312) 353-5792. You may call him to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,



Cheryl L. Newton
Director
Air and Radiation Division

Enclosure

**United States Environmental Protection Agency
Region 5**

IN THE MATTER OF:)	
)	
Lakeside Lithography, LLC)	NOTICE OF VIOLATION
Chicago, Illinois)	
)	EPA-5-09-IL-04
Proceedings Pursuant to)	
the Clean Air Act,)	
42 U.S.C. §§ 7401 et seq.)	
)	

NOTICE OF VIOLATION

The U. S. Environmental Protection Agency finds that Lakeside Lithography, LLC is violating, violating Illinois construction permit 98080080 as follows:

Regulatory Authority

1. Section 110 of the Act, 42 U.S.C. 7410, requires each state to adopt and submit to U.S. EPA for approval a State Implementation Plan (SIP) that provides for the implementation, maintenance, and enforcement of the National Ambient Air Quality Standards (NAAQS). Under Section 110(a) (2) of the Act, 42 U.S.C. 7410(a) (2), each SIP must include a permit program to regulate the modification and construction of any stationary source of air pollution as necessary to assure that NAAQS are achieved. Pursuant to Section 113(a) and (b) of the Act, 42 U.S.C. 7413(a) and (b), upon U.S. EPA approval, SIP requirements are federally enforceable under Section 113. See also 40 C.F.R. 52.23.
2. The Illinois SIP was promulgated on May 31, 1972. Federal Register, Vol. 37, No. 105. On May 31, 1972, U.S. EPA approved Illinois Pollution Control Board (IPCB) Rule 103, as part of the federally enforceable SIP for the State of Illinois. 37 Fed. Reg. 10862.
3. IPCB Rule 103(a) (1) provides that no person shall cause or allow the construction of any new emission source or any new air pollution control equipment, or cause or allow the modification of any existing emission source or air pollution control equipment, without first obtaining a construction permit from the Illinois Environmental Protection Agency (IEPA). IPCB Rule 103(a) (1) has been recodified at 35 Illinois Administrative Code (IAC) Section 201.142.

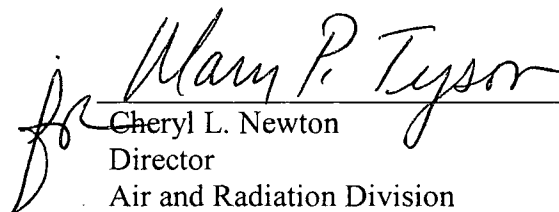
Facts and Discussion

4. Lakeside Lithography, LLC owns and operates two metal coating lines at its Chicago, Illinois facility.
5. Darco Metal Litho, the previous owner and operator of the Chicago facility, was granted a construction permit by the Illinois Environmental Protection Agency (IEPA) on November 23, 1998. The construction permit required, among other things, that:
 - A. emissions from each coating line is captured at 100 percent, and then sent to an afterburner;
 - B. the afterburner combustion chamber must maintain a temperature of 625 degrees Fahrenheit during the coating process;
 - C. a daily log of operating time must be maintained for the capture system.
6. On March 1, 2007, the Chicago facility was sold by Darco Metal Litho to Lakeside Lithography, LLC. Lakeside Lithography, LLC authorized the transfer of all permits in the Name and Ownership Change Information Form (Form Number IL 532- 2834; APC 620), which was submitted to the IEPA.
7. On June 5, 2008, EPA conducted an inspection at the Chicago facility. During the inspection, a plant employee stated that the doors on the permanent total enclosures (PTE) for each afterburner were typically left open during normal operation of each coating line. The total area of each set of open doors exceeds five percent of the surface area of each PTE's four walls, floor and ceiling. 40 C.F.R. Part 51, Appendix M, Method 204 requires that the total area of all natural draft openings shall not exceed five percent of the surface area of the enclosure's four walls, floor, and ceiling.
8. On July 17, 2008, and October 28, 2008, EPA issued requests for information to Lakeside Lithography, LLC pursuant to Section 114(a) of the Act (Information Request). The information provided in response to these requests indicate that the afterburner chamber temperature of each coating line was below the 625 degrees Fahrenheit permitted limit at specific time periods. The Company information also indicated that the facility did not maintain a daily log of operating time for the capture system.

Violation

9. Lakeside Lithography, LLC violated construction permit 98080080, by: operating each coating line afterburner at below the 625 degrees Fahrenheit limit; operating each coating line's PTE to not achieve the 100 percent capture efficiency permit requirement; and not maintaining a daily log of operating time for each capture system.

12/22/08
Date

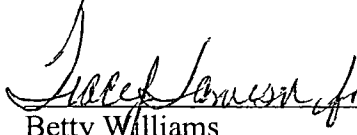

Cheryl L. Newton
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, certify that I sent a Notice of Violation, No. EPA-5-09-IL-04, by Certified Mail, Return Receipt Requested, to:

Mr. Lee Nadler
President
Lakeside Lithography, LLC
16000 South Laflin Street
Chicago, Illinois 60608

on the 24 day of December, 2009.



Betty Williams
Administrative Assistant
AECAS (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 7001 DB2D 0004 D1810 0194